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No. Pages: 17

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Control #: 202404041655
Index #: E2024003035

Date: 04/04/2024

Dias, Liyanagamage Ranganath Prabashwara

Time: 4:55:30 PM

University of Rochester

Total Fees Paid: $0.00

Employee:

State of New York

MONROE COUNTY CLERK'S OFFICE
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JAMIE ROMEO

MONROE COUNTY CLERK

EXHIBIT P

HAJIM SCHOOL OF ENGINEERING & APPLIED SCIENCES
UNIVERSITY of ROCHESTER

RANGA P. DIAS
ASSISTANT PROFESSOR
HOPEMAN ENGINEERING BUILDING, Room 220
P.O. BOX 270132
ROCHESTER, NEWYORK 14627

TEL : (585) 276-4112
FAX : (585) 256-2509
Email: *rdias@rochester.edu*

June 16, 2023

Via Email: stephen_dewhurst@urmc.rochester.edu
Dr. Stephen Dewhurst
Interim Vice President for Research
Vice Dean for Research, School of Medicine & Dentistry
University of Rochester
Cell: (585) 797 7840

Re: Investigation Referred from National Science Foundation ("NSF")

Dear Dr. Dewhurst:

Attached is a list of my current and former students as requested by outside legal counsel for the U of R in connection with the pending confidential internal investigation. I recognize that interviewing my co-authors, colleagues and students is within the scope of the U of R investigation based on the referral from the NSF as set forth in the March 16, 2023 referral letter. I am also appreciative of the NSF's acknowledgement that "[b]ecause a professional reputation is involved, fairness, due process, and confidentiality should be considered paramount. There is no presumption of wrongdoing by [me] or anyone else associated with the alleged research misconduct; rather, your confidential investigation should be designed to determine, without preconceptions, whether research misconduct occurred, and if so, who committed it." *Page 1, NSF March 16, 2023 Referral Letter.* The NSF also confirms that "[a]ny information you acquire during your investigation, including any information we may provide to you, should be kept strictly confidential." *Page 2, NSF March 16, 2023 Referral Letter.*

While recognizing the NSF's mandate for strict confidentiality, I am concerned that the strict confidentiality of this matter may be jeopardized. Although I recognize, appreciate, and support the Committee's ability to conduct interviews it would be helpful to know what measures are being put in place by the Committee to ensure strict confidentiality. For example, it has been brought to my attention that certain persons at UNLV have been made aware of this investigation and that one of their tenured faculty members, and a co-author, has been requested to provide an interview by the Committee. Do you know if those people at UNLV who were informed of this investigation were asked to sign confidentiality and/or non-disclosure agreements? As I am fully supportive of my co-authors being interviewed by the Committee, I would like to make sure that adherence to the NSF's requirement of strict confidentiality is known by and paramount to all people being interviewed.

With respect to my students, I am respectfully requesting that the U of R, outside legal counsel and the Committee be appreciative of the NSF's requirement of strict confidentiality regarding the ongoing internal investigation. I am cooperating fully with this process and was initially informed that this would be a "closed door" investigation intended to preserve the

confidential nature of the investigation. It is hard for me not to recognize that contact with my former and current students by the Committee and/or U of R's outside legal counsel may impact the strict confidentiality of this investigation. Word of the investigation will likely spread throughout the U of R campus as well as throughout the scientific community. Obviously, this will be extremely damaging to my professional reputation. I am respectfully requesting some assistance in making every effort to limit the reputational damage to me resulting from outside lawyers and the external Committee interviewing students in a manner that does not account for the presumption of my innocence as recognized by the NSF. I appreciate any assistance you can provide to me in this regard.

I also want to point out that I am starting to get a little confused by the various contact points and people requesting information from me in the context of the ongoing investigation. For example, U of R's outside legal counsel is communicating with me directly via email. I was previously informed that U of R's legal counsel is not representing me in this matter. As such, counsel's communications to me and any response from me are likely not protected by any attorney-client privilege and all such communications may in fact be available to third parties upon request. I remain optimistic that such communications will not alter the "closed door" nature of the confidential internal investigation. It would be helpful if you would be the contact person to communicate with me about the investigation and requests for additional information.

Lastly, I note the "Second Request for Material from Dr Ranga Dias" from the Investigation Committee appears to contain assertions that I have not cooperated with the Committee. It bears clarifying that I have worked hard to compile the voluminous requested documents in a timely manner with very short notice. I recognize that the documents forwarded by the NSF with its March 16, 2023 letter were provided to the Committee and the Committee is in possession of those documents. If not, I would respectfully request that these documents be provided to the Committee on my behalf. Similarly, several documents that are within the scope of the Committee's investigation are in the public record and presumably readily available to the Committee.

I also want to note that I provided supplemental information to the Committee through you on approximately June 8, 2023. With respect to the Committee's 2nd Request for Materials, consisting mostly of new requests for information not previously requested, I am responding as follows:

Request: The .vi Labview codes were missing sub-routines for communication with Keithley 622. Instruments and "saving to csv with header".

Response: I will upload all Labview sub-routines .vi to the folder as follows:
NSF Documents/LabVIEW

* * *

1 Publication #1
1.1.1 Reference
Elliot Snider, Nathan Dasenbrock-Gammon, Raymond McBride, Mathew Debessai, Hiranya Vindana, Kevin Vencatasamy, Keith V. Lawler, Ashkan Salamat & Ranga P. Dias

"RETRACTED ARTICLE: Room-temperature superconductivity in a carbonaceous sulfur hydride," Nature 586, 373 (2020) https://www.nature.com/articles/s41586-020-2801-z

Request: 1.2.1 Original electronic files saved from the Labview code at the conclusion of a temperature sweep and containing the raw data collected for the resistance versus temperature measurements used to determine all the Tc data points reported on Fig 1c .

Response: All of our data related to Fig. 1c in Publication #1 are located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/Publication #1_CSH Data/Resistance
NSF Documents/Publication #1_CSH Data/Magnetic susceptibility

* * *

Request: 1.2.2 Labview software used for Resistance measurement including main "vi" code and associated "sub-vis" and libraries necessary to run the main vi and create the data output files.

Response: The Labview software that we have and that was used for our relevant measurements for Publication #1 is located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/LabVIEW/AC Resistivity V1.v1
NSF Documents/LabVIEW/double_frequency_twoSR860_V3.2.vi

I note that the Labview software, as it existed in 2018-2019, is no longer available in that exact format because we are always modifying, refining, and evolving the Labview program to where it is functional in the current format. This allows us to collect more information for specific measurements which results in more effective data processing.

If the Committee is requesting that we recreate the Labview software as it existed in 2018-2019, with only the features that existed at that time and without the updated, enhanced and current features, please let me know and allow us sufficient time to recreate the Labview software pursuant to such a request.

* * *

Request: 1.2.3 "Origin" project file used to make Fig 1a, Extended Fig 4 and Extended Fig 7b and 7c

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with files titled as follows:

Publication #1_CSH Data/Origin files/Fig 1a
Publication #1_CSH Data/Origin files/Ext Fig 4

Publication #1_CSH Data/Origin files/Ext Fig 7b
Publication #1_CSH Data/Origin files/Ext Fig 7c

* * *

Request: 1.2.4 Typical cooling rate and warming rate

Response: This is a new request. We do not have any files related to cooling rate and warming rate for Publication #1. For warming rate, at that time, it is natural warming in the range of approximately .25 Kelvin per minute. For cooling rate, at that time, we typically saw 3-4 Kelvin per minute. Currently, we have modified our systems to utilize controlled warming. With a new cryostat that we have, I believe we can control the cooling rate. However, to reiterate, at the time of Publication #1, we did not have controlled warming and/or cooling rates.

* * *

Request: 1.2.5 Pictures or screenshots recorded during first measurements of evidence for room temperature superconductivity

Response: This is a new request. We do not have pictures or screenshots recorded during the first measurements of evidence for room temperature superconductivity.

* * *

Request: 1.3.1 "Origin" project file used to make Fig 2b

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #1_CSH Data/Origin files/Fig 2b

* * *

Request: 1.4.1 "Origin" project file used to make Fig 2a and Extended Figure 7d

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #1_CSH Data/Origin files/Fig 2a
Publication #1_CSH Data/Origin files/Ext Fig 7d

* * *

Request: 1.4.2 Labview software used for Susceptibility measurement including main "vi" code and associated "sub-vis" and libraries necessary to run the main vi and create the data output files.

Response: The Labview software that we have and that was used for our relevant measurements for Publication #1 is located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/LabVIEW/AC Resistivity V1.v1
NSF Documents/LabVIEW/double_frequency_twoSR860_V3.2.vi

I note that the Labview software, as it existed in 2018-2019, is no longer available in that exact format because we are always modifying, refining, and evolving the Labview program to where it is functional in the current format. This allows us to collect more information for specific measurements which results in more effective data processing.

If the Committee is requesting that we recreate the Labview software as it existed in 2018-2019, with only the features that existed at that time and without the updated, enhanced and current features, please let me know and allow us sufficient time to recreate the Labview software pursuant to such a request.

* * *

Request: 1.4.3 Typical cooling rate and warming rate

Response: This is a new request. We do not have any files related to cooling rate and warming rate for Publication #1. For warming rate, at that time, it is natural warming in the range of approximately .25 Kelvin per minute. For cooling rate, at that time, we typically saw 3-4 Kelvin per minute. Currently, we have modified our systems to utilize controlled warming. With a new cryostat that we have, I believe we can control the cooling rate. However, to reiterate, at the time of Publication #1, we did not have controlled warming and/or cooling rates.

* * *

2 Publication #2
2.1.1 Reference
Dylan Durkee, Nathan Dasenbrock-Gammon, G. Alexander Smith, Elliot Snider, Dean Smith, Christian Childs, Simon A. J. Kimber, Keith V. Lawler, Ranga P. Dias, and Ashkan Salamat "Colossal Density-Driven Resistance Response in the Negative Charge Transfer Insulator MnS2" Phys. Rev. Lett. 127, 016401 2021 https://journals.aps.org/prl/abstract/10.1103/PhysRevLett.127.016401

Request: 2.2.1 Labview software used for Resistance measurement including main "vi" code and associated "sub-vis" and libraries necessary to run the main vi and create the data output files.

Response: The Labview software that we have and that was used for our relevant measurements for Publication #2 is located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/LabVIEW/AC Resistivity V1.v1
NSF Documents/LabVIEW/double_frequency_twoSR860_V3.2.vi

I note that the Labview software, as it existed in 2018-2019, is no longer available in that exact format because we are always modifying, refining and evolving the Labview program to where it is functional in the current format. This allows us to collect more information for specific measurements which results in more effective data processing.

If the Committee is requesting that we recreate the Labview software as it existed in 2018-2019, with only the features that existed at that time and without the updated, enhanced and current features, please let me know and allow us sufficient time to recreate the Labview software pursuant to such a request.

* * *

Request: 2.2.2 Data used to produce Figure B4 of Dr Dias Thesis

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #2_MnS2 data/Fig B4 Thesis

* * *

3 Publication #3

3.1.1 Reference

Nathan Dasenbrock-Gammon, Elliot Snider, Raymond McBride, Hiranya Pasan, Dylan Durkee, Nugzari Khalvashi-Sutter, Sasanka Munasinghe, Sachith E. Dissanayake, Keith V. Lawler, Ashkan Salamat & Ranga P. Dias “Evidence of near-ambient superconductivity in a N-doped lutetium hydride” Nature 615, pages 244–250 (2023) https://www.nature.com/articles/s41586-023-05742-0

Request: 3.2.1 Tabular text file of Tc versus pressure used to create Fig 1a or Origin file for Fig1a.

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #3_Reddmatter data (LuHN)/Origin files

* * *

Request: 3.2.2 Original electronic files saved from the Labview code at the conclusion of a temperature sweep and containing the raw data collected for the resistance versus temperature measurements used to determine all the Tc data points reported on Fig1a.

Response: The Labview software that we have and that was used for our relevant measurements for Publication #2 is located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/LabVIEW/AC Resistivity V1.v1
NSF Documents/LabVIEW/double_frequency_twoSR860_V3.2.vi

I note that the Labview software, as it existed in 2020-2023, is no longer available in that exact format because we are always modifying, refining and evolving the Labview program to where it is functional in the current format. This allows us to collect more information for specific measurements which results in more effective data processing.

If the Committee is requesting that we recreate the Labview software as it existed in 2020-2023, with only the features that existed at that time and without the updated, enhanced and current features, please let me know and allow us sufficient time to recreate the Labview software pursuant to such a request.

* * *

Request: 3.2.3 Labview software used for Resistance measurement including main "vi" code and associated "sub-vis" and libraries necessary to run the main vi and create the data output files.

Response: The Labview software that we have and that was used for our relevant measurements for Publication #2 is located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/LabVIEW/AC Resistivity V1.v1
NSF Documents/LabVIEW/double_frequency_twoSR860_V3.2.vi

I note that the Labview software, as it existed in 2020-2023, is no longer available in that exact format because we are always modifying, refining and evolving the Labview program to where it is functional in the current format. This allows us to collect more information for specific measurements which results in more effective data processing.

If the Committee is requesting that I recreate the Labview software as it existed in 2020-2023, with only the features that existed at that time and without the updated, enhanced and current features, please let me know and allow me sufficient time to recreate the Labview software pursuant to such a request.

* * *

FILED: MONROE COUNTY CLERK 04/04/2024 04:53 PM INDEX NO. E2024003035
NYSCEF DOC. NO. 102 RECEIVED NYSCEF: 04/04/2024

Request: 3.3.1 "Origin" project file used to make the published and revised Extended Fig 15

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #3_Reddmatter data (LuHN)/Origin files/Ext Fig 15

* * *

Request: 3.3.2 Matlab code to compute the two alternative background subtraction referred to in the Erratum_Final.pdf document.

Response: This is a new request. There is no "material" to be uploaded or provided. We use built-in tools of Matlab for background fitting. One has to utilize tool background fitting tool called "cftool" and you upload the data and work with various parameters to achieve the best fit.

* * *

Request: 3.4.1 "Origin" project file used to make Fig 2b , Fig 3c and extended Fig 5

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #3_Reddmatter data (LuHN)/Origin files/Fig 2b
Publication #3_Reddmatter data (LuHN)/Origin files/Fig 3c
Publication #3_Reddmatter data (LuHN)/Origin files/Fig 5

* * *

Request: 3.4.2 Labview software used for Susceptibility measurement including main "vi" code and associated "sub-vis" and libraries necessary to run the main vi and create the data output files.

Response: The Labview software that we have and that was used for our relevant measurements for Publication #2 is located in the following file paths that were previously submitted to the Committee on June 3, 2023 as follows:

NSF Documents/LabVIEW/AC Resistivity V1.v1
NSF Documents/LabVIEW/double_frequency_twoSR860_V3.2.vi

I note that the Labview software, as it existed in 2020-2023, is no longer available in that exact format because we are always modifying, refining and evolving the Labview program to where it is functional in the current format. This allows us to collect more information for specific measurements which results in more effective data processing.

If the Committee is requesting that we recreate the Labview software as it existed in 2020-2023, with only the features that existed at that time and without the

updated, enhanced and current features, please let me know and allow us sufficient time to recreate the Labview software pursuant to such a request.

* * *

4 Additional documents

Request: 4.1 PhD Thesis of Raymond McBride

Response: This is a new request. Raymond McBride is a fifth-year graduate student whom I have attempted to support despite some academic and research challenges. To date, and despite my efforts to support Raymond, he has not taken the Qualified Exam. Finally, Raymond McBride has not defended his PhD as of this date.

* * *

Request: 4.2 Pdf Copy of "Issues related to Nature volume 615, 244 (2023)" referred to in Response to Anonymous Paper_Final.pdf

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #3_Reddmatter data (LuHN)/Anonymous comment

* * *

4.3 Pdf Copy of the draft publications referred to in Dias_2.20PM_SSAP2021.pptx

Request: 4.3.1 Nathan Dasenbrock-Gammon, Ranga P. Dias, “Monolayer Graphene under Pressure: Novel Technique for Transport Measurements into the Megabar Regime" Submitted to AIP Advance (2020)

Response: This is a new request. There are several reasons why I am unable to provide this paper currently. Firstly, prepublication papers are works in progress, undergoing peer review and revision processes. It is crucial to maintain the integrity of the scientific process and honor the trust placed in researchers during this critical stage.

Secondly, prepublication papers often contain preliminary findings that may be subject to further refinement or modification. Disseminating incomplete or potentially inaccurate information could lead to misunderstandings or misinterpretations, which can be detrimental to the advancement of scientific knowledge.

The scientific work discussed in the aforementioned paper is currently ongoing, and we are actively engaged in conducting further investigations and experiments. Simultaneously, we are diligently preparing our results for publication in a reputable scientific journal. As per standard practice and our commitment to scientific rigor, we are dedicated to ensuring the accuracy and completeness of our findings before sharing them with the scientific community. Due to the ongoing nature of the research and our adherence to publication processes, we are unable to

provide a copy of the paper at this time. Rest assured, we are committed to submitting the paper for peer review and subsequent publication as soon as it meets the necessary criteria. I will provide the Committee with this paper when it is accepted for publication and published. Thank you for your consideration in this regard.

* * *

Request: 4.3.2 Nathan Dasenbrock-Gammon, Ranga P. Dias, "Pressure induced 3D strain in 2D graphene via a novel experimental method" Submitted to Phys. Rev. Lett. (2021)

Response: This is a new request. There are several reasons why I am unable to provide this paper currently. Firstly, prepublication papers are works in progress, undergoing peer review and revision processes. It is crucial to maintain the integrity of the scientific process and honor the trust placed in researchers during this critical stage.

Secondly, prepublication papers often contain preliminary findings that may be subject to further refinement or modification. Disseminating incomplete or potentially inaccurate information could lead to misunderstandings or misinterpretations, which can be detrimental to the advancement of scientific knowledge.

The scientific work discussed in the aforementioned paper is currently ongoing, and we are actively engaged in conducting further investigations and experiments. Simultaneously, we are diligently preparing our results for publication in a reputable scientific journal. As per standard practice and our commitment to scientific rigor, we are dedicated to ensuring the accuracy and completeness of our findings before sharing them with the scientific community. Due to the ongoing nature of the research and our adherence to publication processes, we are unable to provide a copy of the paper at this time. Rest assured, we are committed to submitting the paper for peer review and subsequent publication as soon as it meets the necessary criteria. I will provide the Committee with this paper when it is accepted for publication and published. Thank you for your consideration in this regard.

* * *

4.4 Pdf Copy of the draft publications referred to in Dias_SSAP2022.pptx

Request: 4.4.1 Nathan Dasenbrock-Gammon, Ranga P. Dias, "Anomalous Plane Stiffness in 2D monolayer graphene at High Pressures" Under review in Phys. Rev. B. (2022)

Response: This is a new request. There are several reasons why I am unable to provide this paper currently. Firstly, prepublication papers are works in progress, undergoing peer review and revision processes. It is crucial to maintain the integrity of the scientific process and honor the trust placed in researchers during this critical stage.

Secondly, prepublication papers often contain preliminary findings that may be subject to further refinement or modification. Disseminating incomplete or potentially inaccurate information could lead to misunderstandings or misinterpretations, which can be detrimental to the advancement of scientific knowledge.

The scientific work discussed in the aforementioned paper is currently ongoing, and we are actively engaged in conducting further investigations and experiments. Simultaneously, we are diligently preparing our results for publication in a reputable scientific journal. As per standard practice and our commitment to scientific rigor, we are dedicated to ensuring the accuracy and completeness of our findings before sharing them with the scientific community. Due to the ongoing nature of the research and our adherence to publication processes, we are unable to provide a copy of the paper at this time. Rest assured, we are committed to submitting the paper for peer review and subsequent publication as soon as it meets the necessary criteria. I will provide the Committee with this paper when it is accepted for publication and published. Thank you for your consideration in this regard.

* * *

Request: 4.5 Jupyter notebook shared by Referee#2 in the post-publication review of Publication#1 (Snider2020) and mentioned in Attachment#8 of the NSF Referral Letter.

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #1_CSH Data/Jupyter notebook

* * *

4.6 Report mentioned in 2022.03.04 Dias.Rodel re Responses to Referees Final.pdf

Request: 4.6.1 “Report of Dr. Maddury Somoyazulu, Prof. Brad Ramshaw”

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Final Nature post publication response/Dr. Somoyazulu
Final Nature post publication response/Dr. Ramshaw

* * *

Request: 4.7 Copy of email from Brad Ramshaw mentioned in Attachment#8 of the NSF Referral Letter.

Response: This is a new request, and we will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Final Nature post publication response/Dr. Ramshaw

* * *

Request: 4.8 Successive drafts (including Supplementary Materials/ Extended Information), Referee reports, rebuttal letters in the pre-publication peer-review for Publications #1, 2 and 3

Response: This is a new request and one which causes me great consternation and anxiety. As you are aware, peer review plays a crucial role in ensuring the quality and integrity of scientific research. It involves a confidential exchange of ideas and critical evaluation among experts in the field. The confidentiality of referee reports and documents is a fundamental aspect of this process. It encourages an open and honest evaluation, fosters constructive criticism, and safeguards against potential biases or undue influence. One of the key principles of this process is the strict confidentiality of referee reports and documents.

By upholding the confidentiality of the peer review process, we can ensure that the scientific community continues to thrive and produce reliable and robust research outcomes. It also protects the integrity of the individuals involved, including both the authors and the reviewers. Recognizing the above principles in the context of the power and authority of the U of R and the Committee, I feel compelled by inherent pressure of cooperation and compliance with the possibility of retaliation against me if I do not provide the requested documentation.

As such, it is under this self-perceived duress and concerns about how the Committee may react if I do not provide the requested documents that I am making these confidential documents available to the Committee with adherence to the strict confidentiality mandated by the NSF and U of R policies related to this investigation. As such, I will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #1_CSH Data/Peer review files
Publication #2_MnS2 data/Peer review files
Publication #3_Reddmatter data (LuHN)/Peer review files

I believe it is essential to highlight the concerns surrounding the potential violation of the confidentiality principles of peer review. I trust that the Committee will handle these documents with the utmost discretion and respect for their confidential nature.

* * *

Request: 4.9 Referee reports and rebuttal letters in the post-publication peer-review for Publications #1, 2 and 3

Response: This is a new request and one which causes me great consternation and anxiety. As you are aware, peer review plays a crucial role in ensuring the quality and integrity of scientific research. It involves a confidential exchange of ideas and critical evaluation among experts in the field. The confidentiality of referee reports and documents is a fundamental aspect of this process. It encourages an open and honest

evaluation, fosters constructive criticism, and safeguards against potential biases or undue influence. One of the key principles of this process is the strict confidentiality of referee reports and documents.

By upholding the confidentiality of the peer review process, we can ensure that the scientific community continues to thrive and produce reliable and robust research outcomes. It also protects the integrity of the individuals involved, including both the authors and the reviewers. Recognizing the above principles in the context of the power and authority of the U of R and the Committee, I feel compelled by inherent pressure of cooperation and compliance with the possibility of retaliation against me if I do not provide the requested documentation.

As such, it is under this self-perceived duress and concerns about how the Committee may react if I do not provide the requested documents that I am making these confidential documents available to the Committee with adherence to the strict confidentiality mandated by the NSF and U of R policies related to this investigation. As such, I will provide this information and upload that file into the NSF Documents folder with a file folder titled as follows:

Publication #1_CSH Data/Peer review files
Publication #2_MnS2 data/Peer review files
Publication #3_Reddmatter data (LuHN)/Peer review files

I believe it is essential to highlight the concerns surrounding the potential violation of the confidentiality principles of peer review. I trust that the Committee will handle these documents with the utmost discretion and respect for their confidential nature.

* * *

In addition to working hard and expeditiously to respond to the Committee's request for materials, I have made myself available to the Committee for an initial 2-hour meeting that took place on June 9, 2023. I am doing my very best to understand and comprehend the comprehensive and exhaustive requests for information while being transparent and fully responsive in an investigative and somewhat legal format that I am generally not familiar with. I am respectfully requesting some accommodation from the U of R and the Committee in terms of my lack of experience in these types of matters as well as with the timing of deadlines for my responses considering my academic, research and personal schedule. In addition to my wife being pregnant, I have academic and research obligations which include pre-planned travel arrangements. This investigation is a priority for me, and I am treating it as a priority. I am only respectfully requesting that the Committee and U of R's outside legal counsel allow me a reasonable period to respond to ongoing requests for materials and interviews. Anything you can do to assist me with this requested accommodation will be greatly appreciated.

As for the proposed meeting on June 29, 2023, unfortunately, I am not available on that date due to a previously scheduled commitment. However, I can be available as follows:

July 5, 2023 All Day
July 6, 2023 All Day
July 7, 2023 All Day
July 11, 2023 After 1:00 p.m.
July 12, 2023 All Day
July 13, 2023 All Day
July 14, 2023 All Day

Although I am not happy with the false accusations of alleged research misconduct, I welcome the University's comprehensive neutral unbiased independent investigation into all the allegations. I am confident that with the information provided herewith and with the appropriate investigative steps, all the allegations will be found to not support a finding of research misconduct as defined by both the University and the NSF. I welcome the opportunity to be fully vindicated and will continue to cooperate fully with the University and the NSF during this process. Thank you for your consideration in this matter.

Respectfully submitted,

Ranga P. Dias
Professor
School of Engineering and Applied Sciences

Attachments: List of Past and Current Students/Faculty

FILED: MONROE COUNTY CLERK 04/04/2024 04:53 PM INDEX NO. E2024003035
NYSCEF DOC. NO. 102 RECEIVED NYSCEF: 04/04/2024

Current members

Students

Hiranya Pasan	since 2019
Ray McBride	since 2019
Nugzari Khalvashi-Sutter	since 2019
Sasanka Munasignhe	since 2021
Ben Smoker	since 2022
Erin Nguyen	since 2022
Gyeongjae Yoo	since 2022
Claudia Zhu	since 2022
Michael Bartusek	since 2023
Migara Jayasinghe	since 2023
Supun Lahiru	since 2023

Research faculty

Sachith Dissanayake	since 2022

Visiting reseachers

Christian Childs	since 2023
Chuck Chimera	since 2023

Former members

Nathan DG.	2018 to 2022 November
Elliot Snider	2018 to 2023 May
Dylan Durkee	2020 to 2022 June
Gyeongjae Yoo	2022-2023
Jose Corredor	2021-2023
Elyse Jones	2021-2022
Hanne Siri Hartveit	2020-2022
Nils Kingston	2019-2020
Ryan Fletcher	2019-2020
Kevin Vencatasamy	2019-2021
Jiayin Zhang	2019-2021
Glyn Ge	2019-2021
Nicholas Pomianek	2019-2021
Mohammad Masood	2019-2020
Jaafar Al Hadab	2019-2020
Noah Meyers	2019-2020
Desmond Wentling	2018-2019
Evan Miller	2018-2019